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12	SAXON MORTGAGE SERVICES, INC.					
13	UNITED STATES DISTRICT COURT					
14	NORTHERN DISTRICT OF CALIFORNIA					
15	MARIE GAUDIN, individually, and on	Case No.: 3:11-cv-01663-JST				
16	behalf of others similarly situated,					
17	Plaintiffs,	<u>CLASS ACTION</u>				
18	VS.	STIPULATION AND [PROPOSED] ORDER TO APPROVE FORM OF				
19 20	SAXON MORTGAGE SERVICES, INC., a Texas corporation,	CORRECTIVE NOTICE				
21	Defendant.					
22	The parties hereby stipulate and request an Order approving the form of the Corrective Notice to be mailed to each recipient who received Class Notice, but has been identified as not being a Class Mamber.					
23						
24						
25	1. On February 28, 2012, and in secondary mailings thereafter, Class Notice was mailed to 2,894 recipients whom the parties believed satisfied the Class					
26						
27						
28	Definition. That Class Notice	is attached hereto as Exhibit A.				

- 2. Subsequently, Saxon has identified 192 of these recipients as not fitting the Class Definition ("Non-Class Members").
- 3. In the Case Management Statement filed September 10, 2014, the parties agreed to an October 15, 2014 deadline to mail Corrective Notices to the Non-Class Members.
- 4. The Court set the October 15, 2014 deadline for mailing corrective notices in the Scheduling Order it issued on October 9, 2014.
- 5. On October 14, 2015, the parties stipulated to, and the Court Ordered, an extension of the deadline for mailing corrective notices to November 14, 2014.
- 6. The parties stipulate to Corrective Notice in the form attached hereto as **Exhibit B** and respectfully seek an Order from the Court approving the Corrective Notice in this form.

IT IS SO STIPULATED.

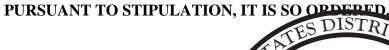
14					
15	DATED:	October, 2014	SEVERSON & WERSON		
16			A Professional Corporation		
17			·	rik Kemp	
18			Erik Kemp		
			BINGHAM MCCUTCHEN LLP		
19			By: /s/ L	aila Abou-Rahme	
20			Laila Abou-Rahme		
21			Attorneys for Defendant,		
22			Saxon Mortgage Services, Inc.		
23					
24			LAW OFFICE OF PETER FREDMAN		
			By: /s/ P	eter Fredman	
25			Peter Fredman		
26			Attorneys for Plaintiff,		
27			Marie Gaudin, individually and on behalf of others similarly situated		
28			omers simulity su	ишси	

I, Erik W. Kemp, am the ECF user whose identification and password are being used to file this Stipulation and [Proposed] Order to Approve the Form of Corrective Notices I hereby attest that Laila Abou-Rahme and Peter Fredman have concurred in this filing.

/s/ Erik Kemp

ORDER

1. The stipulated form of Corrective Notice is hereby approved.



Dated: November 3, 2014

